

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

QIANG WANG, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

YOUKU TODOU INC., VICTOR WING
CHEUNG KOO, and MICHAEL GE XU,

Defendants.

Case No. 15-cv-2258-WHP

RASHID JAHM, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

YOUKU TODOU INC., VICTOR WING
CHEUNG KOO, and MICHAEL GE XU,

Defendants.

Case No. 15-cv-2875-RA

**RESPONSE IN FURTHER SUPPORT OF MOTION TO CONSOLIDATE RELATED
CASES, APPOINT SAMUEL SINAY AS LEAD PLAINTIFF, AND APPROVE THE
SELECTION OF LEAD COUNSEL**

Class member, Mr. Samuel Sinay (“Mr. Sinay” or “Movant”) has reviewed the motions filed in this district and the additional motions filed in the Central District of California by the various competing movants for lead plaintiff and it appears that Mr. Sinay has the largest financial interest of any movant to file in this District, but he does not possess the largest financial interest in the relief sought by the Class as compared to the movants in the Central District of California. The Private Securities Litigation Reform Act of 1995 (“PSLRA”) makes clear that the movant with the largest financial interest in the relief sought by the Class who also satisfies Rule 23 of the Federal Rules of Civil Procedure is presumed to be the “most adequate plaintiff” to serve as the lead plaintiff.

In the event the Court decides to move forward with the motions pending in this District, Mr. Sinay stands ready and able to fill the role of Lead Plaintiff. Mr. Sinay timely filed his motion in the first-filed related case in the Southern District of New York asking to serve as lead plaintiff. In his moving papers, Mr. Sinay demonstrated that he has a significant financial interest in the relief sought by the Class. Furthermore, Mr. Sinay’s losses are typical of all investors in the Class and he is adequate to serve as a lead plaintiff. Accordingly, in the event the Court decides to move forward with the motions pending in this District, Mr. Sinay is willing, ready, and able to serve.

DATED: June 8, 2014

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Jason A. Zweig
Jason A. Zweig, JZ-8107

555 Fifth Avenue, Suite 1700
New York, NY 10017

Telephone: (212) 752-5455
Facsimile: (917) 210-3980
jasonz@hbsslaw.com

Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com

Reed R. Kathrein
Peter E. Borkon
Heidi H. Kalscheur
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
reed@hbsslaw.com
peterb@hbsslaw.com
heidik@hbsslaw.com

[Proposed] Lead Counsel for Mr. Samuel Sinay

CERTIFICATE OF SERVICE

I hereby certify that I am the ECF User whose ID and password are being used to electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Jason A. Zweig
JASON A. ZWEIG